

**AFFIDAVIT IN SUPPORT OF APPLICATION
FOR A SEARCH WARRANT FOR US MAIL PARCELS**

Your Affiant, Douglas Henegar, United States Postal Inspector, Baltimore, MD, being duly sworn, hereby deposes and states as follows:

I. Subject Parcels.

1. This is an Affidavit submitted in support of an Application for a Search Warrant for two (2) subject US Mail Parcels, hereinafter "Subject Parcel," or "SP." The subject parcels are currently located at the Incoming Mail Facility, in Linthicum Heights, Maryland. The subject parcels are specifically identified below:

<i>Subject Parcel</i>	<i>Express (E) or Priority (P) and Tracking ID number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>
1.	(P) 9405509205568748314520	AnaMarie Martinez 3208 Parma Dr Deltona, FL 32738	Alfred Burrell 8508 Valley Hill Ct Randallstown, MD 21133
2.	(E) EJ364042695US	Gustavo Rivera HC-01 Box 4639 Corozal, PR 00783	Alfred Burrell 8508 Valley Hill Ct Randallstown, MD 21133

II. Affiant's Training and Experience

2. Your Affiant, Douglas Henegar, has been a United States Postal Inspector since April 2012 and has completed 12 weeks of basic investigative training, which included the investigation of narcotics related offenses. Your Affiant routinely investigates the use of the US Mail to ship narcotics and narcotics proceeds to and from the Baltimore/Washington area from the known narcotic source areas of Florida, Georgia, California, Arizona, Texas and Colorado (among others). As a result of your Affiant's training and experience, your Affiant is aware that Express

Mail and Priority Mail services are regularly used by narcotics traffickers to ship controlled substances and bulk cash through the US Mail.

3. Based upon my training and experience in the field of narcotic interdiction through the mails, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances or the proceeds thereof (i.e. US currency). These factors, more fully detailed below, are used to identify packages requiring further investigation. In the case of this search warrant, several of these factors were identified, and the package was alerted to by the drug detection canine. The most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows:

a. *Contrasts observed between legitimate business parcels and drug parcels:* As an alternative to First Class Mail (which does not provide a customer with the capability to track the progress of a parcel through the system), the US Postal Service offers Priority Mail Express and Priority Mail. Priority Mail Express is guaranteed (money back) to be delivered on a set date and time, usually overnight. (That deadline is determined at the time of mailing.) The customer receives a receipt with this guaranteed information, and the sender can opt for a signature requirement at the other end or not. Customers can track the parcel on line by its distinct Priority Mail Express tracking number. The weight of the package and the distance traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail. Priority Mail has a delivery service standard of 1-3 business days, but delivery within that time period is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel. Legitimate businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing. In contrast, the drug distributor will pay for the cost of mailing the package at the counter

by using cash or a credit card. Business Priority Mail Express parcels typically weigh no more than 8 ounces, and business Priority Mail parcels typically weigh no more than 2 pounds. Drug packages typically exceed these weights. Address labels on business parcels are typically typed, whereas those on drug packages are typically hand written. In your affiant's experience, it is fairly easy to separate out smaller parcels, which constitute 70% to 80% of all Priority Mail Express and Priority Mail parcels, from other, heavier parcels. Typically, drug traffickers use Priority Mail Express, and will opt out of the requirement of obtaining a signature upon delivery.

b. *Invalid Sender/Return Address:* When drugs are shipped through the mail, the senders generally do not want them back. To distance themselves from parcels containing drugs, often the return addresses and the names of senders are fictitious or false. A fictitious or false address is anything from an incorrect zip code, to a non-existent house number or street. The name of the sender is also typically invalid in one of several ways. Your affiant has seen packages sent by persons with names of celebrities, cartoon characters, or fictional names. More often a search of a law enforcement database reflects that there is no association between the name of the sender and the address provided.

c. *Invalid Recipient/Address:* It would be counter-productive to put the wrong receiving address on a package, but often the named recipient is not actually associated with the receiving address. This allows the person receiving the package to claim that they did not know about its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

d. *Location of Sender:* The fact that a package was sent from narcotics source states such as Arizona, California, Texas, Washington, Colorado, Puerto Rico and Florida (among others) can also indicate that the parcel contains controlled substances.

e. *Smell:* The odor of cocaine, marijuana, and methamphetamine are distinct, and through experience postal inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. Other smells that suggest that a parcel may contain narcotics include the aroma of masking agents. Common masking agents used in an attempt to thwart detection by law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

f. *Heavy Taping:* Heavily taped parcels are another factor that will suggest a drug parcel, because narcotics parcels are heavily taped in an effort to keep the smell inside and to forestall easy checking on the interior contents by lifting up a flap. For this reason, your affiant has also observed excessive glue on the flaps of narcotics parcels as well.

g. *Click-N-Ship:* The US Postal Service created Click-N-Ship as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their residence or business. Drug traffickers create Click-N-Ship accounts as a means of giving a legitimate appearance to their drug mailings. They create the accounts using fictitious account information and often provide pre-paid credit cards as a means of payment, which are difficult to track. Drug traffickers often use legitimate business return addresses in states other than California and Arizona as a means to deter detection, as these other states are not usually considered “source” states for controlled substances. The postage labels are printed/typed, unlike the typical drug related mailing label which is handwritten.

4. It is your affiant’s experience that when these factors are observed, a drug detection

K-9 will likely “alert,” next to the parcel, indicating that the dog has detected the presence of narcotics. As a result, these factors have become a reliable way to profile the parcels being shipped every day.

5. The facts contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge. This affidavit contains that information necessary to establish probable cause to support an application for a search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

III. Probable Cause

6. The following factors or suspicious characteristics are present in the subject parcel:


<i>Subject Parcel Express or Priority</i>	<i>From Source State:</i>	<i>Weight:</i>	<i>Label:</i>	<i>Senders name associated with address? Yes / No</i>	<i>Recipients name associated with address? Yes / No</i>	<i>Canine Alert?</i>
1. Priority	Yes – FL	4 lbs 10 ozs	Typed	No	No	Yes – Riggs
2.Express	Yes – PR	6 lbs 1 ozs	Handwritten	No	No	Yes – Riggs

7. The suspicious characteristics listed above were identified while the subject parcels were in the mail stream. On August 20, 2020, the subject parcels listed above were removed from the mail stream. At that point, law enforcement used standard protocol for canine detection to determine whether there was probable cause that the subject parcels contained narcotics. Specifically, after being removed from the mail stream, the parcels were placed in a secure area

next to several other empty and unused boxes at the Incoming Mail Facility, Linthicum Heights, Maryland. At that time, a narcotic detecting canine named "Riggs" was brought forward to scan the group of boxes, which included the individual subject parcel and the empty and unused boxes placed around the subject parcel. The handler observed the canine and then informed agents that the K-9 alerted on the subject parcel. The canine handler for "Riggs" is Montgomery County Police Detective Scott Carson. "Riggs" was last certified in July 2020 and is trained on the odor of cocaine, heroin, black tar heroin, marijuana, and MDMA. Additionally, "Riggs" receives monthly recurrent narcotics odor detecting training. As indicated in the chart, the drug detection K-9 alerted to the presence of narcotics in the subject parcel.

IV. Conclusion

8. Your affiant submits that based upon the above indicators reflected in the subject parcels described herein, based upon my training and experience, and based upon the alert of a trained drug detecting K-9 on the packages, I believe there is probable cause that the above-described subject parcels contain narcotics or controlled substances, or the proceeds thereof (i.e. US currency) and/or materials relating to the distribution of controlled substances through the United States Mail.



Douglas Henegar
United States Postal Inspector

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 21st day of August, 2020.

A. David Copperthite
The Honorable A. David Copperthite
United States Magistrate Judge
District of Maryland